

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

CR 16-2917 JAP

Plaintiff,

vs.

YUSEF CASANOVA,

Defendant.

DEFENDANT’S PROPOSED VOIR DIRE

COMES NOW THE DEFENDANT, Yusef Casanova, by and through his counsel of record Assistant Federal Public Defenders Brian A. Pori and Melissa A. Morris to respectfully request that this Honorable Court *voir dire* jurors by asking the following questions:

1. Yusef Casanova is the Defendant in this case. Does anyone have any strong feelings about the name “Yusef” which might affect your ability to be fair?
2. The crime in this case was alleged to have occurred in the Albuquerque neighborhood known as the “International District.” Does anyone have such strong feelings about that area that it might difficult for you to remain impartial?

3. This case will involve people who were addicted to drugs at the time of the offense. Does anyone have such strong feelings about alcoholism or drug addiction that you might be biased against one side or the other?
4. The defense of entrapment is a potential defense in this case. If I instruct you to consider this defense, is there anyone whose strong feelings might prevent them from following my instructions?
5. Is there anyone on the panel who has ever been the victim of a crime? If so is there anything about that experience which would make it difficult for you to be a fair juror in this case?
6. Is there anyone on the panel who has a close friend or family member who is a member of law enforcement?
7. The crime alleged in this case involves the alleged unlawful possession of a firearm. Do any of you have such strong feelings about firearms that you cannot be fair and impartial in this case?
8. Is there anyone who feels, *for any reason*, that you simply would not be comfortable sitting on the jury?
9. Is there anyone on the panel who cannot presume, as you look at Mr. Casanova here today, that he is innocent until proven guilty?

10. If the prosecution fails to prove its case beyond a reasonable doubt,
are there any of you who would be incapable of finding Mr. Casanova
not guilty?

In the addition, counsel for Mr. Mann respectfully request that this
Honorable Court provide him 20 minutes to pose questions to the jury related to
theses questions, especially on the issues of substance abuse and entrapment.

Respectfully submitted,

By: Submitted Electronically 3/22/19
Brian A. Pori
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Counsel for Yusef Casanova

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of March, 2019, I filed the foregoing Defendant's Requested Voir Dire electronically through the CM/ECF system, which caused a copy of the pleading to be served electronically on opposing counsel of record addressed as follows:

Samuel A Hurtado, Esq.
Mark Christian Pfizenmayer, Esq.
Norman C. Cairns, Esq.
Assistant United States Attorney
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/s/ filed electronically 3/22/19
Brian A. Pori